

MEGHANN A. TRIPLETT (SBN 268005)
Meghann@MarguliesFaithLaw.com

JONATHAN SERRANO (SBN 333225)
Jonathan@MarguliesFaithLaw.com

MARGULIES FAITH, LLP

16030 Ventura Blvd., Suite 470

Encino, California 91436

Telephone: (818) 705-2777

Facsimile: (818) 705-3777

Attorneys for Jeremy W. Faith, Chapter 11 Plan Fiduciary

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION**

In re:

NATIONAL ASSOCIATION OF
TELEVISION PROGRAM EXECUTIVES,
INC.,

Debtor.

JEREMY W. FAITH, Chapter 11 Plan
Fiduciary,

Plaintiff,

v.

PERY CONSULTING GROUP, LLC, a
California Limited Liability Company

Defendant.

Case No.: 1:22-bk-11181-MB

Chapter 7

Adv. No.: 1:24-ap-01052-MB

**PLAINTIFF'S UNILATERAL STATUS
REPORT**

Status Conference:

Date: October 23, 2025

Time: 1:30 p.m.

Place: U.S. Bankruptcy Court
Courtroom 303
21041 Burbank Boulevard
Woodland Hills, CA 91367

A. PLEADINGS/SERVICE

1. Have all parties been served with the complaint/counterclaim/cross-claim,
etc. (Claims documents)? **No.**

2. Have all parties filed and served answers to the Claims Documents? **No**

3. Have all motions addressed to the Claims Documents been resolved? **No**

4. Have counsel met and conferred in compliance with LBR 7026-1? **No.**

5. If your answer to any of the four preceding questions is anything other than
an unqualified "YES", please explain: **See Section G Below.**

B. READINESS FOR TRIAL

1. When will you be ready for trial in this case? **N/A**

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay. **N/A**

3. When do you expect to complete your discovery efforts? **N/A**

4. What additional discovery do you require to prepare for trial? **N/A**

C. TRIAL TIME

1. What is your estimate of the time required to present your side of the case at trial (including rebuttal stage of applicable)? **N/A**

2. How many witnesses do you intend to call at trial (including opposing parties)? **N/A**

3. How many exhibits do you anticipate using at trial? **N/A**

D. PRETRIAL CONFERENCE

1. A pretrial conference is not requested for the following reason: **Plaintiff intends to add defendants and additional allegations to the complaint.**

E. SETTLEMENT

1. What is the status of settlement efforts? **N/A**

2. Has this dispute been formally mediated? **No**

3. Do you want this matter sent to mediation at this time? **No**

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent. **Plaintiff consents. Defendant has not responded. See Section G below.**

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL:

Following the Default, on January 13, 2025, Plaintiff received a letter from Rafe Pery, the C.E.O. of Pery Consulting Group LLC ("Pery Consulting"), regarding the complaint. In the letter, Mr. Pery notified the Plaintiff, that Pery Consulting "completed a

1 sale if its assets through an Article 9 transaction and is in liquidation.” Mr. Pery concluded
2 his letter by stating that “any attempt to collect on prior payments made or collect on a
3 judgement will be fruitless as Pery Consulting does not have any assets.” Thereafter,
4 Plaintiff learned of facts demonstrating that Pery Consulting fraudulently transferred its
5 assets to its alter ego Accounting 501.

6 Plaintiff intends to seek leave to amend the complaint to add defendant, Accounting
7 501, LLC a Wyoming Limited Liability Company, registered in California as a foreign entity
8 under the California Alternative Name A501, LLC (referred to herein as “Accounting 501”),
9 and that is the immediate or mediate transferee of property transferred by the debtor that
10 is the subject of the complaint and recoverable under section 550 of the Bankruptcy Code.
11 Moreover, Plaintiff intends to allege the factual predicates establishing that Accounting
12 501 is an alter ego of defendant Pery Consulting Group, LLC (“Pery Consulting”).

13 Plaintiff has also been working to obtain additional data and documents from
14 NATPE's directors and officers and former counsel relevant to the Estate's claims to
15 properly prepare the amended complaint. However, these efforts have been delayed due
16 to various disputed turnover issues related to the recovery of NATPE's books and records.

17 Plaintiff will also seek to consolidate this action with the related pending adversary
18 proceeding *Faith v. JP Bommel, et al.*, Case No. 1:24-ap-01055-MB (the “Bommel
19 Adversary”) as certain of the new allegations involve common questions of law or fact,
20 and Plaintiff believes that consolidation of the two actions will streamline proceedings and
21 avoid duplication of effort and inconsistent rulings.

22 Plaintiff anticipates having a draft of the amended completed within the next ten
23 days and will file a motion for leave to amend as well as a motion to consolidate the
24 instant action with the Bommel Adversary within the next 30 days.

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1 Based on the foregoing, Plaintiff respectfully requests that the status conference
2 hearing in this matter be continued for approximately 90 days to allow Plaintiff to seek
3 leave to amend and to consolidate this action with the Bommel Adversary.

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5 DATED: October 17, 2025

MARGULIES FAITH, LLP

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7 By: /s/ Meghann A. Triplett
8 Meghann A. Triplett
9 Attorneys for Plaintiff, Jeremy W. Faith,
Chapter 11 Plan Fiduciary
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DECLARATION OF MEGHANN A. TRIPLETT

I, Meghann A. Triplett, declare as follows:

1. I am an attorney licensed to practice before all courts of the State of California and before the United States District Court for the Central District of California. I am an attorney at the law firm of Margulies Faith, LLP, and am one of the attorneys responsible for the representation of Jeremy W. Faith, Chapter 11 Plan Fiduciary and Plaintiff herein ("Plaintiff").

2. I make this Declaration in support of the Plaintiff's unilateral status report, to which this declaration is attached.

3. The Defendant failed to file a response to the Complaint and on December 31, 2024, the Clerk entered default against the Defendant (Adv. Dkt. No. 10).

4. On or about January 13, 2025, I received a letter via email from Pery Consulting Group LLC ("Pery Consulting") signed by Rafe Pery, the C.E.O. of Pery Consulting, responding to the complaint. In the letter, Pery notified the Plaintiff that Pery Consulting "completed a sale of its assets through an Article 9 transaction and is in liquidation." Mr. Pery concluded his letter by stating that "any attempt to collect on prior payments made or collect on a judgement will be fruitless as Pery Consulting does not have any assets."

5. Plaintiff conducted further investigation and has learned facts demonstrating that Pery Consulting fraudulently transferred all or substantially all of its assets to its alter ego, Accounting 501.

6. Plaintiff intends to seek leave to amend the complaint to add defendant, Accounting 501, LLC a Wyoming Limited Liability Company, registered in California as a foreign entity under the California Alternative Name A501, LLC (referred to herein as "Accounting 501"), and that is the immediate or mediate transferee of property transferred by the debtor that is the subject of the complaint and recoverable under section 550 of the Bankruptcy Code. Moreover, Plaintiff intends to allege the factual predicates establishing that Accounting 501 is an alter ego of defendant Pery Consulting.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
16030 Ventura Blvd., Suite 470, Encino, CA 91436

A true and correct copy of the documents entitled **PLAINTIFF'S UNILATERAL STATUS REPORT; DECLARATION OF MEGHANN A. TRIPLETT IN SUPPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 17, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **October 17, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY: Service on Judge not required per Judge Barash's Procedures re: Serving Judge's Copy of Documents (Rev. 1/8/24)

DEFENDANT: Pery Consulting Group, LLC, Agent: Rafe Pery, 7607 Wiscasset Drive, West Hills, CA 91304

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

NONE.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 17, 2025

Date

Vicky Castrellon

Printed Name

/s/ Vicky Castrellon

Signature

ADDITIONAL SERVICE INFORMATION

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Samuel Mushegh Boyamian on behalf of Plaintiff Jeremy W. Faith, Chapter 11 Plan Fiduciary

samuel@marguliesfaithlaw.com,

Angela@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Amber@MarguliesFaithLaw.com

John-Patrick McGinnis Fritz (TR)

jpfrustee@lnbyg.com, jpf@trustesolutions.net

Jonathan Serrano on behalf of Interested Party Courtesy NEF

Jonathan@MarguliesFaithLaw.com,

vicky@marguliesfaithlaw.com; angela@marguliesfaithlaw.com; amber@marguliesfaithlaw.com

Meghann A Triplett on behalf of Plaintiff Jeremy W. Faith, Chapter 11 Plan Fiduciary

Meghann@MarguliesFaithlaw.com,

Angela@MarguliesFaithLaw.com; Vicky@MarguliesFaithLaw.com; Amber@MarguliesFaithLaw.com; Drew@MarguliesFaithLaw.com

United States Trustee (SV)

ustpregion16.wh.ecf@usdoj.gov